

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LISA DOE,

Plaintiff,

v.

DARREN K. INDYKE AND RICHARD D. KAHN
AS JOINT PERSONAL REPRESENTATIVES OF
THE ESTATE OF JEFFREY E. EPSTEIN,
FINANCIAL TRUST COMPANY, INC., NES, LLC,
HBRK ASSOCIATES, INC.,

Defendants.

Case No. 1:19-cv-07773 (ER) (DCF)

NOTICE OF DEFENDANTS' MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior pleadings and proceedings in this action, Defendants will move this Court before the Hon. Edgardo Ramos, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, at a time to be scheduled by this Court, for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing with prejudice Counts II, V, and VII through XII of Plaintiff's First Amended Complaint (ECF No. 41) in their entirety and Count VI to the extent it is time-barred, as well as to dismiss with prejudice Plaintiff's demand for punitive damages; and for such other and further relief as may be just and proper.

Dated: New York, New York
February 24, 2020

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz
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Attorneys for Defendants